

1 PHILLIP A. TALBERT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant U.S. Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700

8 Attorneys for the United States

9
10
11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 APPROXIMATELY \$19,100.00 IN
18 U.S. CURRENCY,

19 Defendant.

20
21 STIPULATION AND ORDER EXTENDING TIME
22 FOR FILING A COMPLAINT FOR FORFEITURE
23 AND/OR TO OBTAIN AN INDICTMENT
24 ALLEGING FORFEITURE

25
26 It is hereby stipulated by and between the United States of America and potential claimant Steven
27 Zangrilli (“claimant”), by and through their respective counsel, as follows:

28 1. On or about January 25, 2024, claimant filed a claim in the administrative forfeiture
1 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$19,100.00 in U.S.
2 Currency (hereafter “defendant currency”), which was seized on November 2, 2023.

3 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
2 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
3 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
4 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

5 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline is April 24, 2024.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to June
5 24, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to June 24, 2024.

11 Dated: 4/23/2024

PHILLIP A. TALBERT
United States Attorney

12 By: /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant U.S. Attorney

15 Dated: 4/23/2024

16 /s/ Eric A. Pack
17 ERIC A. PACK
18 Attorney for potential claimant
19 Steven Zangrilli
20 21 Prospect Ave
21 Glen Cove, NY 11542
22 EricPack0401@gmail.com

23 (Signature authorized by phone)

24 **IT IS SO ORDERED.**

25 Dated: _____

26 _____
27 United States District Judge
28